

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

The Mercy Hospital, Inc.,

Plaintiff

v.

Massachusetts Nurses Association,

Defendant

Civ. No. 04-30014-MAP

**DEFENDANT'S MOTION FOR EXTENSION OF TIME FOR
FILING RESPONSE TO PLAINTIFF'S DISPOSITIVE MOTION**

Now comes the Defendant, Massachusetts Nurses Association, and moves for additional time to file its response to the Motion to Vacate Arbitration Award filed by the Plaintiff, Mercy Hospital. There is good cause to grant this Motion insofar as the Plaintiff received a two-week extension for filing its Motion, with the result that the Motion was not received by counsel for the Defendant until after he began a period of family leave, during which his work schedule is much reduced. While counsel for the Defendant has made efforts to complete his response in the time allotted, it has proved impossible.

Counsel for the Defendant has contacted Plaintiff's Counsel with regard to this request but has not heard back as of this writing.

Wherefore, the Defendant requests that it be granted from July 14, 2004 until July 22, 2004 to file its response to the dispositive motion filed by the Plaintiff.

Respectfully submitted,

For the Defendant,

Massachusetts Nurses Association,

By its counsel,


Mark A. Hickernell, BBO# 638005
McDonald & Associates
153 Cordaville Road, Suite 210
Southborough, MA 01772
(508) 485-6600

Dated: July 14, 2004

CERTIFICATE OF SERVICE

I, Mark A. Hickernell, hereby certify that I have this day by facsimile and first-class mail, postage prepaid, served a copy of the foregoing Defendant's Motion For Extension Of Time For Filing Response To Plaintiff's Dispositive Motion upon Maurice M. Cahillane, Esq., Egan, Flanagan and Cohen, P.C., 67 Market Street, P.O. Box 9035, Springfield, Massachusetts 01102-9035.

Dated: July 14, 2004


Mark A. Hickernell